

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Edward J Decker

Debtor(s)

and

Stefanie A Decker

Codebtor(s)

LSF9 Master Participation Trust, or its Successor
or Assignee

Movant

vs.

Edward J Decker

Stefanie A Decker

Charles J DeHart, III (Trustee)

Respondent(s)

Chapter 13

Bankruptcy No. 5:20-bk-02404-RNO

SETTLEMENT STIPULATION

WHEREAS, on August 11, 2020, Edward J Decker (the "Debtor") filed a Petition under Chapter 13 of the Bankruptcy Code in the United States Bankruptcy Court for the Middle District of Pennsylvania;

WHEREAS, on November 19, 2020, LSF9 Master Participation Trust (Movant) filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. Section 362(a) (the "Motion") regarding property located at: 145 Twin Lakes Dr, Shohola, Pennsylvania 18458;

WHEREAS, Movant and the Debtor are desirous of settling the dispute among and between themselves;

NOW THEREFORE, each in consideration of the promises of the other and intending to be legally bound, subject to the approval of the Bankruptcy Court, it is hereby agreed by and among counsel for Movant, by and through its attorneys, MARGARET GAIRO, ESQUIRE, ANN E. SWARTZ, ESQUIRE, LAUREN M. MOYER, ESQUIRE, and JOHN M. KOLESNIK, ESQUIRE, and the Debtor, by and through his/her counsel, Mark E. Moulton, Esquire,

("Debtor's Counsel") as follows:

1. The parties hereby certify that the post-petition delinquency is \$3,973.68, consisting of post-petition payments and late charges for the months of September 1, 2020 through December 1, 2020. Debtor's monthly mortgage payment is \$993.42. Movant has incurred attorney fees and costs totaling \$1,231.00, thereby increasing the amount due to \$5,204.68.

2. On or before January 15, 2021, the Debtor shall make a payment of \$1,000 payable to LSF9 Master Participation Trust at the following address: 13801 Wireless Way, Oklahoma City, Oklahoma 73134-2500, thereby reducing the post-petition arrearage to \$4,204.68.

3. Commencing January 1, 2021, through and including June 1, 2021, Debtor shall tender payment of \$700.78 in addition to any regularly scheduled post-petition payments in order to cure the post-petition arrearage.

4. Debtor shall resume making regular monthly mortgage payments in the amount of \$993.42 beginning on January 1, 2021.

5. All payments are to be made payable to LSF9 Master Participation Trust at the following address: 13801 Wireless Way, Oklahoma City, Oklahoma 73134-2500.

6. The last four digits of your loan number 4536. Please remember to write your entire account number on the lower left-hand corner of your payment to ensure proper processing.

7. Should Debtor fail to comply with any of the terms of this Stipulation, including but not limited to, failure to make the above described payments, or any regular monthly mortgage payment commencing after the cure of the post-petition delinquency, then Movant may send Debtor and counsel a written notice of default of this Stipulation. If the default is not cured within ten (10) days of the date of the notice, counsel for Movant may file a Certification of Default with the Court. Said Certification of Default may include a certification of Debtor's

failure to pay subsequent payments that fall due after the date of the notice of default. Upon Certification, the Court shall enter an Order granting relief from the automatic stay as to the mortgaged property.

8. In the event the Debtor converts his/her case to Chapter 11, the terms of this Stipulation shall remain in full force and effect. In the event that Debtor converts his/her case to a Chapter 7, Debtor shall cure all pre-petition and post-petition arrears within ten (10) days of the date of conversion. Failure to cure the arrears shall constitute an event of default under this Stipulation and Movant may send Notice of Default and certify default as set forth in the preceding paragraph.

9. Attorney fees and costs for issuing Notice to Cure, Notice / Certificate / Affidavit of Default, and order for relief are recoverable and may be added to the arrearage.

10. Counsel for Debtor has authority to settle this matter on behalf of his/her clients.

 Digitally signed by Ann Swartz
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email=aswartz@mwc-law.com,
c=US
Date: 2021.01.15 14:59:05 -05'00'

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01/08/2021

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Attorney for Trustee
Charles J DeHart, III (Trustee)
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1/15/2021

Date: